

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

MARY PHILLIPA SLEDGE, MARY
JANE PIDGEON SLEDGE TRUST, and
PIDGEON SLEDGE FAMILY LIMITED
PARTNERSHIP,

Plaintiffs,

v.

Case No. 2:13-cv-2578-STA-cgc

INDICO SYSTEM RESOURCES, INC. and
CLEAL WATTS, III,

Defendants.

**DEFENDANTS' AMENDED MOTION TO WITHDRAW COUNSEL AND
INCORPORATED MEMORANDUM IN SUPPORT**

Come now Defendants, Indico System Resources, Inc. and Cleal Watts, III (“Defendants” or “Watts”), by and through its counsel of record, and hereby move this Court to allow their counsel, Bruce McMullen, Lori Patterson, and Mary Wu of Baker, Donelson, Bearman, Caldwell & Berkowitz, PC (“Baker Donelson”) - to withdraw as attorneys of record in this matter and to be removed from receiving electronic notices of filings in this case through the ECF system.

In support of their Motion, Defendants state that they are in agreement that Baker Donelson has fulfilled its requirements to them, but Defendants do not have financial resources to continue forward with Baker Donelson as representing counsel. Defendants further state that they are speaking with other attorneys and expect that counsel will be substituted in the near future to represent them in this matter.

Pursuant to Local Rule 83.5, the following is the name, last known address, and last known telephone number of Defendant Watts: Cleal Watts, 8926 Forest Hills Blvd., Dallas, Texas 75281-4001, 214-659-2197. Indico System Resources, Inc. is listed at the same address.

Accordingly, in addition to allowing counsel to withdraw, Defendants ask that this Court grant a temporary stay on litigation of this matter for thirty (30) days for Defendants to obtain new counsel. Defendants state that the discovery deadline is November 12, 2015 and trial has been set for May of 2016. Consequently, Plaintiffs will not be prejudiced by this temporary delay for Defendants to find new counsel.

WHEREFORE, PREMISES CONSIDERED, Defendants move this Court to allow Baker Donelson to withdraw as attorneys of record in this lawsuit and for a temporary stay on litigation for thirty (30) days.

Respectfully Submitted,

BAKER DONELSON BEARMAN
CALDWELL & BERKOWITZ, PC

/s/ Bruce McMullen

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Attorneys for Defendants

CERTIFICATE OF CONSULTATION

Bruce McMullen called Darrell Phillips regarding the relief requested in this Motion on March 30, 2015. Mr. Phillips advised that Plaintiffs would not oppose Baker Donelson's withdrawal as counsel for Defendants, but would oppose the stay of litigation and request that Defendants be ordered to register for notifications from ECF to avoid delays or issues with service or notice.

/s Bruce McMullen

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 31th day of March, 2015, a copy of the foregoing was electronically filed and served on the parties listed below via first class mail, postage prepaid, unless said party is a registered CM/ECF participant who has consented to electronic notice, and the Notice of Electronic Filing indicates that Notice was electronically mailed to said party:

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Dr. Cleal Watts
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s/ Bruce McMullen

Bruce A. McMullen